

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

United States of America,

Plaintiff,

v.

Four Thousand, Five Hundred and
Ninety One Dollars and Fifty Cents in
U.S. Currency (\$4,591.50),

Two Thousand Two Hundred and Sixty
Five Dollars (\$2,265.00),

and

Two Million, Fifty Five Thousand, Eight
Hundred and Twenty Six Dollars in U.S.
Currency (\$2,055,826.00),

Defendants.

Civil Case No. 3:12-CV-395

Judge James Carr

Magistrate Judge Vernelis K. Armstrong

**FOURTH JOINT MOTION TO EXTEND
TIME FOR FILING CLAIM AND
ANSWER**

The Plaintiff United States of America and Claimants Herman Wayne Bradley and Jacquelyn A. Bradley (“Claimants”), collectively “the Parties,” hereby jointly move, through undersigned counsel, to extend the deadline for Claimants to file a Claim and Answer from June 30, 2013 to December 30, 2013.

On February 17, 2012, the United States filed a judicial complaint in forfeiture against the defendant assets, (Doc. No. 1), and sent personal notice of the complaint to Claimants on the same date. Under Supplemental Rule G(5)(a)(ii), the court may set a different time for the Claimants to file a claim for “good cause.” On December 20, 2012, the Court extended the time for the Claimants to file a claim and answer until June 30, 2013.

The Parties respectfully request that this Court grant what is anticipated to be the Parties' final request for extension of time. The United States continues to pursue a criminal investigation involving the defendant assets, and the Parties' believe it is in their best interests to stay litigation pending resolution of the investigation. This Stipulation to Extend Time is not intended to extend the time periods for other potential claimants to file claims and responsive pleadings.

Accordingly, the Parties request that the time in which Claimants must file a claim and answer for the defendant assets be extended until **December 30, 2013**.

/s/ Kristina W. Supler
Kristina W. Supler
Friedman & Frey, L.L.C.
1304 West 6th Street
Cleveland, OH 44113
Counsel for Claimants Herman Wayne Bradley and Jacquelyn A. Bradley

Executed this 20th day of June 2013.

/s/ Guillermo J. Rojas
Guillermo J. Rojas (0069882)
Assistant U.S. Attorney
433 N. Summit Street, Suite 308
Toledo, Ohio 43604
Counsel for the United States

Executed this 20th day of June 2013.

IT IS SO ORDERED:

United States District Judge

Date:_____